

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SARA S. ECHEVARRIA,	)	
	)	
Plaintiff,	)	
v.	)	
	)	No. 05-284 GMS
U-HAUL INTERNATIONAL, INC., ROGER	)	
MAYFIELD, NATIONWIDE GENERAL	)	
INSURANCE COMPANY, U-HAUL CO. OF	)	TRIAL BY JURY DEMANDED
ARIZONA, U-HAUL CO. OF COLORADO	)	
and U-HAUL CO. OF FLORIDA,	)	
	)	
Defendants.	)	

**DEFENDANTS U-HAUL INTERNATIONAL, INC., U-HAUL CO. OF ARIZONA,  
U-HAUL CO. OF COLORADO AND U-HAUL CO. OF FLORIDA'S  
MOTION TO CONTINUE TRIAL DATE**

Defendants, U-Haul International, Inc., U-Haul Co. of Arizona, U-Haul Co. of Colorado and U-Haul Co. of Florida (hereinafter "U-Haul Defendants") by and through its attorneys, Blank Rome LLP and Quarles & Brady LLP, hereby moves this Honorable Court to continue to trial date. In support of the motion the U-Haul Defendants state as follows:

1. Plaintiff filed her Complaint on March 16, 2005 and her First Amended Complaint on March 9, 2006.
2. The U-Haul Defendants filed their answers to the Amended Complaint on May 17, 2006 denying all allegations against them.
3. The trial in this matter is currently scheduled to begin on April 9, 2007. The trial in this matter is expected to last three to four days.

4. The U-Haul Defendants request a continuance of the April 9, 2007 trial date due to a conflicting trial in the case entitled *Daboura v. The Raymond Corp. et al.*, No. 2004-C-0900, pending in the Court of Common Pleas of Lehigh County, Pennsylvania.

5. Judge J. Brian Johnson recently scheduled the trial in the *Daboura* case to begin on April 9, 2007. The *Daboura* trial is expected to last two to three weeks. Counsel for the U-Haul Defendants advised Judge Johnson of the trial in this matter already scheduled to begin on April 9, 2007. Judge Johnson's schedule is such that there are no other possible dates on his calendar to accommodate the possibly three week long trial in the *Daboura* matter. Judge Johnson advised counsel to inform Judge Sleet and request this rescheduling of the trial. Judge Johnson also invited this Court to contact him by telephone, if necessary, to discuss this scheduling problem. See Affidavit of Francis H. Lococo attached hereto as Exhibit A.

6. Plaintiff and defendant Nationwide Insurance Co. have indicated in conversations with counsel that they do not object to the continuance of the trial to an earlier date, but would object if the new trial date is after April 9, 2007. These defendants request the continuance to a date that accommodates this conflict and the Court's schedule.

WHEREFORE, U-Haul International, Inc., U-Haul Co. of Arizona, U-Haul Co. of Colorado and U-Haul Co. of Florida respectfully request this Honorable Court for the entry of an Order continuing the April 9, 2007 trial of this matter to a date that accommodates the aforementioned conflict and the Court's schedule and for such other and further relief as this Court deems appropriate and just.

Dated: August 14, 2006



Steven L. Caponi (DE ID No. 3484)

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